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Valerie Yates, Esq.
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November 28, 2005

Filed via ECFS

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Subscriber Acknowledgement Report of Comcast Corporation (November 28, 2005)

Dear Ms. Dortch:

Please find enclosed the Subscriber Acknowledgement Report of Comcast Corporation, dated November 28, 2005, in WC Docket No. 05-196.

Please let me know if you have any questions regarding this filing.

Sincerely,

/s/ Valerie Yates

Valerie Yates, Esq.
Counsel – Telephony
Valerie_Yates@Comcast.com

**Before the
Federal Communications Commission**

In the Matter of)	
)	
E911 Requirements for IP-Enabled)	WC Docket No. 05-196
Service Providers)	
)	

**COMCAST CORPORATION
SUBSCRIBER ACKNOWLEDGEMENT REPORT
NOVEMBER 28, 2005**

Pursuant to the October 31, 2005 Public Notice issued by the Enforcement Bureau (“Bureau”) of the Federal Communications Commission (“Commission”) in WC Docket No. 05-196,¹ Comcast Corporation (“Comcast”)² submits this fifth report regarding its compliance with the Commission’s Enhanced 911 (“E911”) requirements³ on behalf of Comcast subsidiaries that are currently providing interconnected voice over Internet protocol (“VOIP”) services.⁴

As discussed in its prior reports, Comcast has received affirmative acknowledgements from all existing customers through their consent to the terms of the Subscriber Agreement,

¹ Enforcement Bureau Provides Additional Guidance to Interconnected Voice Over Internet Protocol Service Providers Concerning Enforcement of Subscriber Acknowledgement Requirement, *Public Notice*, WC Docket Nos. 04-36 and 05-196, DA 05-2530 (rel. Oct. 31, 2005).

² Comcast Corporation is principally involved in the development, management, and operation of broadband cable networks and programming content. Comcast Cable Communications, LLC, is the largest cable company in the United States, serving more than 21 million cable subscribers.

³ IP-Enabled Services and E911 Requirements for IP-Enabled Service Providers, First Report and Order and Notice of Proposed Rulemaking, WC Docket Nos. 04-36 and 05-196 (rel. June 3, 2005) (“VOIP E911 Order”).

⁴ Comcast uses IP technology in the access network connected to the Class 5 switch serving a portion of its cable telephony customers in the Detroit market (“hybrid IP-circuit-switched service”). In late 2004, Comcast launched a new service that uses soft switches and Internet Protocol to transmit voice over its private, managed network (“IP-enabled voice service”). This filing encompasses both Comcast’s primary IP-enabled voice service as well as the hybrid IP-circuit-switched service. These services are referred to collectively as “interconnected VOIP service.”

which includes clear and understandable disclosures regarding its interconnected VOIP service, including possible limitations of the E911 functionality provided with the service.⁵ Prior to the issuance of the Commission's rules in this docket, each customer's affirmative acknowledgement was memorialized by signature on the work order form and through the ongoing actions of enrolling in, using, and paying for the services provided.

Following the Commission's rulemaking, Comcast updated its work order forms so that new customers are provided the E911 advisory information directly on the work order form and must acknowledge those limitations by signing the work order at the time of installation. The new work order forms have been available in all markets since August 17, 2005. Comcast has provided supplemental E911 advisory information to, and sought supplemental acknowledgements from, all existing and new customers who had Comcast's interconnected VOIP services installed prior to the implementation of the revised work order forms. Comcast's continued filings in this docket pertain to those customers whose services were installed prior to August 17, 2005 and who have not yet responded to our repeated requests that they provide supplemental acknowledgements of the E911 advisory information ("remaining customers").

Comcast is continuing its efforts to obtain supplemental acknowledgements from its remaining customers. At this point, Comcast has spent nearly six months developing and implementing various methods to provide the information to and obtain responses from these customers. Comcast's methods have been described in prior reports in this docket. With every new initiative, Comcast sees a temporary increase in the acknowledgement rate but then it subsides. While Comcast recognizes and supports the importance of ensuring that customers have been provided important information about possible limitations in 911 service, and we have

⁵ Detroit area customers of its hybrid IP-circuit-switched service are deemed to have agreed to the terms and conditions of the tariff on file with the Michigan Public Service Commission.

in fact provided this information to all remaining customers on multiple occasions, we are concerned that the repeated and persistent efforts necessary to obtain supplemental acknowledgements from its remaining customers may undermine these goals by creating a nuisance that the customer seeks to avoid. Nevertheless, Comcast is continuing to make every reasonable effort to ensure compliance both with the letter and the spirit of the Commission's supplemental notification and acknowledgement requirements in the VOIP E911 Order. In accordance with the Bureau's Public Notice, Comcast will notify the Commission once supplemental acknowledgements have been obtained from all remaining customers.

Representatives of Comcast would welcome the opportunity to discuss the matters presented in its reports should the Commission have any questions or require further information.

Respectfully submitted,

/s/ Joseph W. Waz Jr.
Joseph W. Waz Jr.
COMCAST CORPORATION
1500 Market Street
Philadelphia PA 19102

CERTIFICATE OF SERVICE

I, Valerie Yates, hereby certify that a copy of the foregoing Subscriber Acknowledgement Report, filed by Comcast Corporation in WC Docket No. 05-196, was served by electronic mail on November 28, 2005 to the persons listed below.

/s/ Valerie Yates
Valerie Yates

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